

EXHIBIT A

From: [Hoernlein, Michael](#)
To: [Eckstein, Maya](#); [Van Winter, Samantha](#); tom.davidson@alston.com
Cc: [Powell, Lewis](#); [King, Jeremy](#); [Elliker, Kevin](#); [Ruival, Carley](#); [Sehla Ashai](#); Damon.Porter@lw.com; Ehson.Kashfipour@lw.com; [Connelly, Blair](#); [Rowen, Zachary](#)
Subject: RE: Doe et al v. Mast et al (WDVA) -- deposition of Ms. Motley
Date: Monday, April 22, 2024 9:29:08 AM

This Message Is From An External Sender

Hunton Andrews Kurth warning: This message came from outside the firm.

Thanks, Maya. We'll certainly coordinate with the other parties, but it would be helpful to have some potential dates for your clients' availability given the approaching discovery cutoff.

Thanks,
Mike

Michael R. Hoernlein
Partner

ALSTON & BIRD

1120 South Tryon Street
Suite 300
Charlotte, NC 28203-6818
+1 704 444 1041 (O)
+1 704 620 4902 (M)
Michael.Hoernlein@alston.com

From: Eckstein, Maya <meckstein@hunton.com>
Sent: Monday, April 22, 2024 9:21 AM
To: Hoernlein, Michael <Michael.Hoernlein@alston.com>; Van Winter, Samantha <Samantha.VanWinter@alston.com>; tom.davidson@alston.com
Cc: Powell, Lewis <lpowell@hunton.com>; King, Jeremy <JKing@hunton.com>; Elliker, Kevin <KElliker@huntonak.com>; Ruival, Carley <CRuival@huntonak.com>; Sehla Ashai <ashai@elbiallylaw.com>; Damon.Porter@lw.com; Ehson.Kashfipour@lw.com; Connelly, Blair <BLAIR.CONNELLY@lw.com>; Rowen, Zachary <Zachary.Rowen@lw.com>
Subject: RE: Doe et al v. Mast et al (WDVA) -- deposition of Ms. Motley

EXTERNAL SENDER – Proceed with caution

Mike, good morning. With respect to Plaintiffs' depositions, please coordinate with the other defendants regarding dates, length of the depositions, and how the defendants will split up their time. We will only put them up once for deposition. See, e.g., FRCP 30(a)(2)(A)(ii).

Thank you.

Maya

From: Hoernlein, Michael <Michael.Hoernlein@alston.com>
Sent: Thursday, April 18, 2024 3:57 PM
To: Eckstein, Maya <meckstein@hunton.com>; Van Winter, Samantha <Samantha.VanWinter@alston.com>; tom.davidson@alston.com
Cc: Powell, Lewis <lpowell@hunton.com>; King, Jeremy <JKing@hunton.com>; Elliker, Kevin <KElliker@huntonak.com>; Ruival, Carley <CRuival@huntonak.com>; Sehla Ashai <ashai@elbiallylaw.com>; Damon.Porter@lw.com; Ehson.Kashfipour@lw.com; Connelly, Blair <BLAIR.CONNELLY@lw.com>; Rowen, Zachary <Zachary.Rowen@lw.com>
Subject: RE: Doe et al v. Mast et al (WDVA) -- deposition of Ms. Motley

This Message Is From An External Sender

Hunton Andrews Kurth warning: This message came from outside the firm.

Maya,

I'll look at Ms. Motley's availability and ours and get back to you with some potential dates. Can you please send me your clients' availability for their depositions during those windows?

Thanks,
Mike

Michael R. Hoernlein
Partner
ALSTON & BIRD
1120 South Tryon Street
Suite 300
Charlotte, NC 28203-6818
+1 704 444 1041 (O)
+1 704 620 4902 (M)
Michael.Hoernlein@alston.com

From: Eckstein, Maya <meckstein@hunton.com>
Sent: Thursday, April 18, 2024 11:23 AM
To: Hoernlein, Michael <Michael.Hoernlein@alston.com>; Van Winter, Samantha <Samantha.VanWinter@alston.com>; tom.davidson@alston.com
Cc: Powell, Lewis <lpowell@hunton.com>; King, Jeremy <JKing@hunton.com>; Elliker, Kevin <KElliker@huntonak.com>; Ruival, Carley <CRuival@huntonak.com>; Sehla Ashai <ashai@elbiallylaw.com>; Damon.Porter@lw.com; Ehson.Kashfipour@lw.com; Connelly, Blair <BLAIR.CONNELLY@lw.com>; Rowen, Zachary <Zachary.Rowen@lw.com>

Subject: Doe et al v. Mast et al (WDVA) -- deposition of Ms. Motley

EXTERNAL SENDER – Proceed with caution

Michael, we need to schedule the deposition of Ms. Motley. Please let us know her availability for deposition in the following time frames:

- Week of May 13
- Week of May 20
- Week of May 27
- Week of June 3
- June 10-11

Thank you.

Maya



Maya Eckstein

Partner

meckstein@HuntonAK.com

p 804.788.8788

[bio](#) | [vCard](#)

Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

2200 Pennsylvania Avenue, NW
Washington, DC 20037
HuntonAK.com

This communication is confidential and is intended to be privileged pursuant to applicable law. If the reader of this message is not the intended recipient, please advise by return email immediately and then delete this message and all copies and backups thereof.

NOTICE: This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.